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MEMO ENDORSED

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December 1, 2009

VIA FEDERAL EXPRESS AND FACSIMILE

The Honorable Frank Maas
United States Magistrate Judge
United States Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 740
New York, NY 10007-1312

If successor counsel files a notice
of appearance, I will grant
Mr. Martin's motion and
adjourn the 12/14/09 conference
to permit the new attorney to become
familiar with the case. If not, the
conference will proceed as previously
scheduled.

Re: In re Terrorist Attacks on September 11, 2001, MOL 03-1570 (GBD) (FM)

Dear Judge Maas;

I write to inform you of an update our firm received regarding the hearing scheduled for December 4, 2009 and Sanabel Al Kheer's efforts to retain new counsel in advance of the hearing. We have been informed that they identified prospective new counsel who they intend to retain, however, their prospective new counsel is presently out of town.

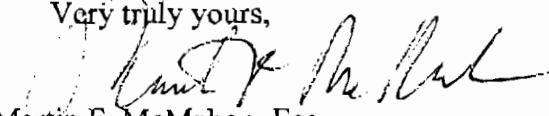
Accordingly, we request on behalf of Sanabel Al Kheer that a brief continuance of the hearing be granted to allow time for Sanabel Al Kheer's new counsel to enter an appearance and adequately familiarize himself with the discovery dispute to be addressed at the hearing. We understand that new counsel intends to contact the court and our firm upon his return to begin the process of preparing for the hearing. As the termination of our firm by Sanabel Al Kheer severely limits our authority to act on behalf of the organization if we were to appear at the December 4, 2009, we believe a brief continuance allowing new counsel to participate fully in the near future would be a reasonable resolution under the circumstances.

Please advise whether it will be possible to reschedule the conference. At present we have not yet communicated with Plaintiffs' counsel, however we are aware that Plaintiffs have

Frank, USA, 12/1/09

opposed our motion to withdraw pending new counsel entering an appearance. Counsel for the Plaintiffs (listed below) have been sent a copy of this letter by electronic mail.

Very truly yours,



Martin F. McMahon, Esq.

CC: Counsel for Plaintiffs (Sean Carter, Jerry Goldman, James Kreindler, Andrew Maloney, and Robert Haefele) and counsel for Mr. Mirza (Steven Barentzen)